

Robert K. Kry
MoloLamken LLP
The Watergate, Suite 500
600 New Hampshire Avenue, N.W.
Washington, D.C. 20037
T: 202.556.2011
F: 202.556.2001
rkry@mololamken.com
www.mololamken.com

April 25, 2022

The Honorable Sarah Netburn
United States Magistrate Judge
United States District Court
for the Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

## BY ECF

Re: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570 (S.D.N.Y.)

Dear Judge Netburn:

Dallah Avco respectfully submits the attached Reply Declaration of Robert K. Kry in further support of its April 11, 2022, letter motion for reimbursement of fees and expenses in connection with plaintiffs' last-minute purported cancellation of the hearing to take Alp Karli's testimony in Istanbul. Dkt. 7871. For the reasons set out therein and in Dallah Avco's and the Kingdom of Saudi Arabia's other motion papers, Dallah Avco respectfully requests that, to the extent the Court grants any relief in favor of the Kingdom, the Court also grant the same relief in favor of Dallah Avco.

Respectfully submitted,

Robert Kry

cc: All counsel by ECF